

OASIS WELLNESS CENTER
1238 Anderson Road
Clawson, Michigan 48017

May 7, 2015

RE: Michigan House Judiciary Committee; House Bill 4209 and 4210

Mr. Chairman, Mr. Vice Chairman and Honorable Members of the Committee:

My name is Paul Weisberger, Vice President and In-house counsel for Oasis Wellness Center. Oasis Wellness Center has common ownership with the regional Michigan based 60+ location tobacco chain Wild Bills Tobacco, and intends, when the Bills are passed, to lawfully open and operate a chain of Provisioning Centers. We hope to bring our corporate structure and familiarity with heavy regulation to this new market.

We have been patiently following the development of the proposed Bills to amend the MMMA, both in 2013 and 2014. During that time period we have had a chance to meet with the sponsor of the Bills and other members of the Legislature. Additionally, we have met City Mayors, City Managers and with County Sheriffs' and their staff, some of which are vocal opponents of the Bills. We have met with current Michigan "dispensary" owners and numerous leaders in the Colorado marijuana market. I appear before you today, having collected a wealth of information and offer the following comments:

- 1) We agree with many of the concerns raised by the law enforcement officials we have met. It's my understanding that many of the issues raised will be addressed in a forthcoming revised Bill that may not be in front of this Committee today. However, one of those concerns is that all products, not just marijuana infused products (MIPs), be properly labeled. As one official put it, "there is more information about the PayDay candy bar on my desk than is contained in this 'Medical' marijuana." We concur that all product, both flower and MIPs, should contain adequate information about the recipient, together with the quantity, quality and characteristics of the actual product.
- 2) House Bill 4209 omits the testing of "flower" but does provide for the testing of MIPs. We feel that the Bill must be revised to require the testing of ALL medical marijuana or we will continue to face vocal opposition from law enforcement.
- 3) Having met with many industry leaders in Colorado and with Michigan law enforcement, we believe that the grow operation needed to supply consistent, high quality medical marijuana should be based in a larger scale "commercial grow" type model. It is my understanding that law enforcement was once opposed to this concept but has now moved 180 degrees and has taken the position that we MUST bring the grow operations out of the black market basements of cities like Oak Park and Sterling Heights. This can

be accomplished by allowing commercial grow operations similar to Colorado, which means the plant count would exceed 72 and even 99 plants. This would allow for a consistent and cost effective supply of product while at the same time moving the grow operations out of our neighborhoods. To expand upon the above, a decent Provisioning Center should sell approximately 60-90 pounds of medical marijuana per month. Based on a typical grow cycle with an 8 oz per plant production for a 72 plant grow operation, a typical Provisioning Center would need 9 to 12 growers to supply its product. This does not even take into account Section 4A(2) of House Bill 4210 which limits the transfer of medical marijuana to 50 ounces per Provisioning Center per qualifying patient or registered caregiver per month. If we continue with the 72 plant grow concept, topped with the 50 oz monthly limitation, we will continue to drive the basement black market grower. We must bring this above ground and out of the neighborhoods through a commercial grow operation that provides consistent lower cost medical marijuana.

Thank you for your time.

Sincerely

Paul D. Weisberger